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RECEIVED

May 16, 2003

MAY 16 2003

HOWARD J. BRAUN
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Federal Communications Commission
Office of Secretary

VIA HAND DELIVERY

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

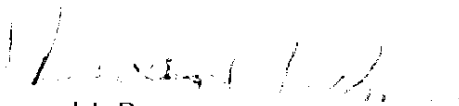
Re: DA03-622
RM-10666
Comments of H&R Production Group, LLC

Dear Ms. Dortch:

On behalf of our client, **H&R PRODUCTION GROUP, LLC**, there is enclosed herewith for filing in the above referenced proceeding an original and four copies of its Comments In Support of NTA's Proposal to Establish A Rural Translator Service.

Should there be any questions concerning this matter, please contact the undersigned.

Very truly yours,


Howard J. Braun

No. of Copies rec'd 014
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

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MAY 16 2003

In re Inquiry to

Federal Communications Commission
Office of Secretary

**ESTABLISH A NATIONAL RURAL
TRANSLATOR SERVICE**

DA 03-622

RM-10666

To: MEDIA BUREAU

**COMMENTS IN SUPPORT OF NTA'S PROPOSAL
TO ESTABLISH A RURAL TRANSLATOR SERVICE**

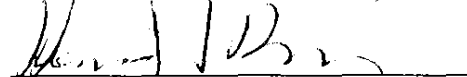
H&R PRODUCTION GROUP, LLC ("H&R"), by its attorneys, hereby files its Comments in response to the Commission's Notice of March 6, 2003 herein requesting comments on the National Translator Association's ("NTA") request to establish a new rural TV translator service. In support thereof, the following is shown:

1. H&R is the licensee of WBWP-LP, Channel 57, West Palm Beach, Florida. Station WBWP-LP broadcasts each week over 20 hours of live, original programming and five hours of pre-produced TV programming to the West Palm Beach market and neighboring communities. Its programming philosophy, "together we make a difference" is continually reflected in its locally originated programmed, attuned to the needs and interests of its diverse LPTV service area. Importantly, as a TV translator licensee, H&R is vitally concerned that TV translators in America continue to flourish in a conducive regulatory environment and that such stations, especially in underserved rural areas, continue to provide free over the air programming to such areas. It is for this reason that H&R fully supports NTA's rulemaking proposal.

2. More specifically, on March 6, 2003, the FCC issued a Notice herein inquiring whether the agency should proceed with a full scale rule making proceeding to establish a national rural translator service as proposed by the NTA. NTA properly believes that inauguration of such a new service will help ensure the delivery of free broadcast services to rural America, especially during the digital conversion. H&R believes that NTA has presented cogent and compelling reasons for the Commission to institute rulemaking proposing simplified procedures to establish a new rural TV translator service to serve America's hinterlands some of which may even be in areas outside markets such as West Palm Beach, Florida.

3. Accordingly, H&R urges the FCC to solicit formal comments from all interested parties on NTA's request. In short, given the Commission's avowed goal of establishing a DTV broadcast service with the attendant benefits of HDTV, a free over the air commercial and non-commercial broadcast service can only be guaranteed in rural areas by TV translators in the manner proposed by NTA. Given these circumstances, NTA's rulemaking proposal ought to be adopted by the Commission.

Respectfully submitted,
H&R PRODUCTION GROUP, LLC



By: Howard J. Braun, Esq.
Its Attorneys

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May 16, 2003

CERTIFICATE OF SERVICE

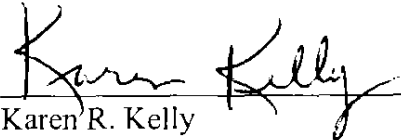
I, Karen Kelly, a secretary at Katten Muchin Zavis Rosenman, hereby certify that on this 16th day of May 2003, a copy of the foregoing **COMMENTS IN SUPPORT OF NTA'S PROPOSAL TO ESTABLISH A RURAL TRANSLATOR SERVICE** was sent via first class US Mail, to the following:

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Karen R. Kelly